

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
EARTH FARE, INC., *et al.*,) Case No. 20-10256 (Joint Administration Requested)
)
Debtors.)
)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE, that William F. McDonald III, 10920 Via Frontera, Suite 220, San Diego, CA 92127 represents ShopCore Properties, as landlord and party in interest in the above-captioned matter (“Creditor”). The undersigned hereby enters this Notice of Appearance pursuant to Section 1109(b) of Title 11 of the United States Code (the “*Bankruptcy Code*”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”) and request copies of all notices and pleadings pursuant to Bankruptcy Rule 2002(a). The undersigned requests that all such notices be addressed as follows:

ShopCore Properties
Attn: William F. McDonald III, Esq.
10920 Via Frontera, Suite 220
San Diego, CA 92127

PLEASE TAKE FURTHER NOTICE that, pursuant to Sections 342 and 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in

the rules specified above but also includes any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, electronic mail, hand or personal delivery, telephone, telegraph, telex, or otherwise filed or made with regard to this matter.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Notices nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to be a waiver of Creditor's (i) rights to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy, or proceeding related thereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which these creditors are or may be entitled under agreements, in law, or in equity.

Dated: February 20, 2020

Respectfully submitted,

/s/William F. McDonald III

William F. McDonald III, Esq. (CA-230128)

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